Jon A. Wilson Brett C. Jensen Michael P. Sarabia BROWN LAW FIRM, P.C. 315 North 24th Street P.O. Drawer 849 Billings, MT 59103-0849 Tel. (406) 248-2611 Fax (406) 248-3128

Joel M. Taylor, Esq. (appearing *pro hac vice*) MILLER MCNAMARA & TAYLOR LLP 412 Clock Tower Commons Dr.

Brewster, NY 10509

Telephone/E-Fax: (845) 288-0844

Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc.

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA **BILLINGS DIVISION**

TRACY CAEKAERT, and CAMILLIA Cause No. CV 20-52-BLG-SPW MAPLEY,

Plaintiffs,

VS.

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA, and BRUCE MAPLEY SR.,

Defendants.

DEFENDANT WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC.'S JOINDER IN DEFENDANT WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA'S RESPONSE **BRIEF IN OPPOSITION TO** PLAINTIFFS' MOTION FOR RECONSIDERATION OF MOTION **TO AMEND**

Defendant Watchtower Bible and Tract Society of New York, Inc. ("WTNY") hereby joins in Defendant Watch Tower Bible and Tract Society of Pennsylvania's ("WTPA") Response Brief in Opposition to Plaintiffs' Motion for Reconsideration of Motion to Amend (Doc. 414), in requesting the Court deny Plaintiffs' Motion for Reconsideration of Motion to Amend (Doc. 407).

WTNY likewise opposes Plaintiffs' Motion and fully incorporates as though wholly set forth herein the arguments, cited authorities, supporting facts, and legal analysis set forth in WTPA's Response Brief (Doc. 414).

DATED this 17th day of June, 2024.

By: /s/ Michael P. Sarabia

Jon A. Wilson / Brett C. Jensen / Michael P. Sarabia

BROWN LAW FIRM, P.C.

Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc.

By: /s/ Joel M. Taylor

Joel. M. Taylor (appearing *pro hac vice*)

MILLER MCNAMARA & TAYLOR LLP

Attorneys for Defendants Watchtower Bible and Tract Society of New York, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on June 17th, 2024, a copy of the foregoing was served on the following person(s):

- 1. U.S. District Court, Billings Division
- Robert L. Stepans/Ryan R. Shaffer/James C. Murnion MEYER, SHAFFER & STEPANS, PLLP 430 Ryman Street Missoula, MT 59802
- 3. Matthew L. Merrill (appearing *pro hac vice*)
 MERRILL LAW, LLC
 1401 Delgany Street, #404
 Denver, CO 80202
- Gerry P. Fagan/Christopher T. Sweeney/Jordan W. FitzGerald MOULTON BELLINGHAM PC P.O. Box 2559 Billings, MT 59103-2559
- 5. Bruce G. Mapley Sr. 3905 Caylan Cove Birmingham, AL 35215

by the following means:

<u>1-4</u> CM/E	ECF	Fax
Hand	Delivery	E-Mail
	Mail	Overnight Delivery Services
	By:	/s/ Michael P. Sarabia
	-	Jon A. Wilson / Brett C. Jensen /
		Michael P. Sarabia
		BROWN LAW FIRM, P.C.
		Attorneys for Defendant Watchtower
		Bible and Tract Society of New York,
		Inc.